

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

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individually, and on behalf of the estate of Juan
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24

25 UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27
28

1 DORA BAIRES, et al,

2 Plaintiffs,

3 vs.

4 THE UNITED STATES OF AMERICA, et al.

5 Defendants.

No.: CV 09-5171 CRB

AMENDED STIPULATION AND ORDER

Honorable Charles R. Breyer

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8 In order to complete pending depositions and production of documents and to facilitate
9 expert discovery, counsel for the parties have met and conferred regarding the need for a short
10 extension of the current February 28, 2013 deadline for completion of fact discovery and regarding a
11 schedule for expert discovery and motion practice. The parties hereby stipulate to the schedule set
12 forth below and respectfully request the Court's approval:

13 Completion of fact discovery: April 3, 2013

14 Designation of Plaintiffs' expert reports: May 10, 2013

15 Designation of Defendants' expert reports: May 31, 2013

16 Designation of suppl./rebuttal experts: June 14, 2013

17 Completion of expert discovery: July 31, 2013

18 Dispositive motions filed by: August 16, 2013

19 Dispositive motions heard by: September 20, 2013

20 Pre-trial conference: October 10, 2013

21 Trial: The parties propose a trial date of November 4, 2013, or a date thereafter convenient to
22 the Court.

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1 **IT IS SO STIPULATED.**

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3 DATED: February 21, 2013.

4 REED SMITH LLP

5
6 By /s/ Steven M. Kohn
7 Steven M. Kohn
8 Attorneys for Dora Baires, individually, and on
9 behalf of the estate of Juan Carlos Baires; and
10 Teofilo Miranda

11 DATED: February 21, 2013.

12 MELINDA HAAG, United States Attorney

13 By /s/ Abraham A. Simmons
14 Abraham A. Simmons, Assistant U.S. Attorney
15 (as authorized on February 21, 2013)
16 Attorneys for Defendant United States and Brian
17 Myrick

18 DATED: February 21, 2013.

19 THERESA A. GOLDNER, County Counsel

20 By /s/ Marshall Scott Fontes
21 Marshall Scott Fontes, Deputy
22 (as authorized on February 21, 2013)
23 Attorneys for Defendant County of Kern, et al.

24 **IT IS SO ORDERED.**

25 DATED: February 25, 2013.

26 The Honorable
27 United States District Judge

